

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

AURORA FINANCIAL GROUP, INC.,

Plaintiff,

VS.

MARY K TOLLEFSON; MORTGAGE
ELECTRONIC REGISTRATION SYSTEMS,
INC., OCCUPANTS OF THE PROPERTY,

Defendants.

Case No.: No. 2:20-cv-00297-JLR

**JOINT STIPULATION AND ORDER TO
CONTINUE TIME FOR INITIAL
DISCLOSURES**

MARY K. TOLLEFSON

Counter-Plaintiff,

vs.

AURORA FINANCIAL GROUP, INC.

Counter-Defendants.

And

FREEDOM MORTGAGE CORP.,
MCCARTHY & HOLTHUS LLP.

Third-Party Defendants

IT IS HEREBY STIPULATED BY AND BETWEEN ALL PARTIES AS

FOLLOWS.

1 Counter-Plaintiff Mary K. Tollefson (“Plaintiff”), and Third-Party Defendant McCarthy
2 & Holthus LLP (the “MH”) (collectively, the “Parties”), by and through their respective counsel
3 of record, hereby respectfully apply to this Court for an Order continuing the date for M&H to
4 submit Initial Disclosures pursuant to Federal Rule of Civil Procedure (“FRCP”) 26(a)(1) until
5 45 days after the Court files its ruling on MH’s Motion to Dismiss.

6 WHEREAS, on April 14, 2020, MH filed a motion to dismiss all claims against M&H in
7 this action pursuant to FRCP Rule 12(b)(6) (“Motion to Dismiss”);
8

9 WHEREAS, the Motion to Dismiss is scheduled for hearing on June 5, 2020;
10

11 WHEREAS, the Parties met and conferred pursuant to FRCP Rule 26(f) on May 26,
12 2020, to consider the nature and basis of the claims and defenses, the possibilities for promptly
13 settling or resolving the case; making or arranging for the disclosures required by FRCP Rule
14 26(a)(1), discussing any issues about preserving discoverable information, and developing a
15 proposed discovery plan;

16 WHEREAS, the Parties’ Initial Disclosures, pursuant to FRCP Rule 26(a)(1), and the
17 Court’s Order at Docket No. 21, are currently due on May 26, 2020;
18

19 WHEREAS, Ms. Tollefson provided M&H with her initial disclosure on May 26, 2020,
20 however, the Parties have agreed that postponing M&H’s Initial Disclosure deadline until a date
21 after this Court rules on the pending Motion to Dismiss would allow the Parties to avoid
22 potentially unnecessary litigation costs;

23 NOW THEREFORE, IT IS HEREBY STIPULATED, between the Parties, subject to this
24 Court’s approval, that: the last date for the Parties to serve Initial Disclosures pursuant to FRCP
25 Rule 26(a)(1), be continued until forty-five (45) days following service of notice of this Court’s
26 ruling on the Motion to Dismiss.
27
28

1
2
IT IS SO STIPULATED

3
4 Dated: May 26, 2020

McCarthy & Holthus, LLP

5
6 /s/ Warren Lance

Warren Lance WSBA No. 51586

7 Dated: May 26, 2020

The Law Office of Arthur Ortiz

8 /s/ Arthur Ortiz

9 Arthur E. Ortiz WSBA No. 26676

10 Attorney for Mary K. Tollefson

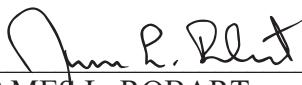
11
12 **ORDER**

13 For good cause shown, the above Stipulation is adopted as follows:

14
15 The last date for M&H to submit Initial Disclosures pursuant to FRCP Rule 26(a)(1) is
16 hereby continued until forty-five (45) days after service of notice of the Court's ruling on MH's
17 Motion to Dismiss.

18
19 **IT IS SO ORDERED.**

20 Dated: June 1, 2020

21
22
23
24
25
26
27
28 
JAMES L. ROBART
UNITED STATES DISTRICT JUDGE